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April 22, 2011

*Via ECF and Facsimile to (973) 645-4412*

The Honorable Michael A. Shipp, U.S.M.J.  
The United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: ***Reyes v. Keith Machinery Corp., et al.***  
Civil Action No.: 2:09-CV-5309  
Our File No.: 348-1033

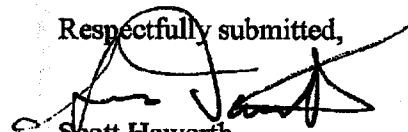
Dear Judge Shipp:

This firm represents defendant Keith Machinery Corp. ("KMC") in the above-referenced matter. We are writing to respectfully request, on consent of all parties, a brief, two-week extension of the deadline to serve rebuttal expert reports and remaining discovery deadlines. This request is based upon the fact that our expert is unexpectedly unavailable for the next few weeks, which is beyond the control of KMC.

In particular, we request that the deadlines be extended as follows:

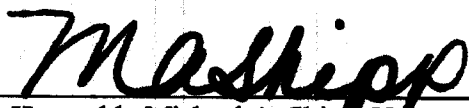
- All rebuttal reports shall be produced by May 17, 2011;
  - All expert depositions shall be completed by June 13, 2011;
  - The final pretrial conference shall be held on July 19, 2011 at 1:00 pm; and
- The joint proposed final pretrial order shall be submitted to the Court by July 12, 2011.
- We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,

  
Scott Haworth  
Haworth Coleman & Gerstman, LLC

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So Ordered:

  
The Honorable Michael A. Shipp, U.S.M.J.  
Dated: April 25, 2011

Cc:

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